REMARKS

Claims 1-20 are pending in this application. For purposes of expedition, claim 8 has been amended in several particulars for purposes of clarity and brevity, in accordance with current Office policy, to alternatively define Applicants' disclosed invention and to assist the Examiner to expedite compact prosecution of the instant application.

Turning now to the substance of the Office Action dated on September 1, 2006, claims 1-7, 11-13 and 15-20 have been rejected under 35 U.S.C. §102(e) as being anticipated by newly cited art, Tsumagari et al., U.S. Publication No. 2003/0161615 filed on February 26, 2003 and published on August 28, 2008 (herein after "Tsumagari '615"). While Applicants disagree with the Examiner's analysis of Tsumagari '615, Applicants respectfully request that the rejection of claims 1-7, 11-13 and 15-20 be withdrawn for reasons that Applicants' claimed priority documents under 35 U.S.C. §119, i.e., Korean Patent Application No. 2002-12728 filed on March 9, 2002; Korean Patent Application No. 2002-31069 filed on June 3, 2002; and Korean Patent Application No. 2002-70014 filed on November 12, 2002 predate the filing date of February 26, 2003 of Tsumagari et al., U.S. Publication No. 2003/0161615. Certified copies of these priority documents were submitted on March 10, 2003 in the parent application, Serial No. 10/384,063. Certified translations of these priority documents will be submitted in due course to perfect Applicants' claim of priority under 35 U.S.C. §119 and to overcome the rejection.

Lastly, claims 8-10 and 14 have been rejected under 35 U.S.C. §103 as being unpatentable over newly cited art, Ralph LaBarge ("WebDVD Products & Techniques, Part 2" downloaded from: www.dvdmadeesay.com/subscriber/articles/02122002-2b/0222001-2b.pdf, @2001, pp. 1-9, hereafter referred to as "LaBarge") in view of Michael Morrison et al. (XML Unleased, Sam's Publishing, Indianapolis, IN, Dec. 1999, pp. 149-153, 156-172, 174-179, 184-202, 206-209, 289-290, 424, 427, 431-443 and 463-467) (hereinafter referred to as "Morrison"). In support of this rejection, the Examiner asserts that LaBarge, as a primary reference, discloses,

> "A method of presenting a markup document in an interactive mode, (See Labarge "Microsoft WebDVD" section on page 5, especially the third paragraph which discusses interactive HTML pages." the method comprising: decoding markup resources representing AV data linked to the markup document and outputting the markup document rendered along with the markup resources representing AV data for presentation on a screen in which the markup resources

representing AV data are provided in a display window defined by the markup document. (See LaBarge Figure 2 and "InterActual Player 2.0" section on page 3, especially the first paragraph which discusses DVD video and integrated HTML content, a user interface for the display of DVD video in a window and the customization of InterActual Player 2.0 GUI skins.)

However, the Examiner admits that LaBarge does **not** explicitly disclose the specific markup language operations recited, but relies on Morrison, as a secondary reference, for allegedly disclosing the recited well-known and inherent markup language concepts, including "interpreting the markup document and generating a document object tree according to a predetermined rule", "interpreting a stylesheet to define a document form of the markup document and generating a style rule/selector list", "interpreting a script code that is included in the markup document," "applying the style rule/selector list to the document tree to create a document form," and "generating a formatting structure that corresponds to the document form; rendering the markup document according to the format structure." This assertion is made to support a conclusion that "it would have been obvious to one of ordinary skill ... to apply the teachings of Morrison for the benefit of LaBarge, because to do so would have provided a programmer with the ability to cleanly separate content and presentations of a markup document, as taught by Morrison in the second paragraph under "A CSS Primer" on page 156."

However, the Examiner's assertion is believed to be incorrect. Nevertheless, base claim 8 has been amended to clearly define audio/visual (AV) data and markup documents in an interactive mode in which AV data corresponding to the markup document is embedded in the markup document loaded on a screen for presentation, and the interaction between the markup document and the user which advantageously enables the user to control the presentation on the markup resources representing AV data in the manner defined in Applicants' base claim 8.

As a primary reference, LaBarge only discloses a text book on how to add Internet connectivity to a DVD-video title. Specifically, pages 4-5 of LaBarge refer to the type of scrypt used to support the context sensitive button that allows the user to search the Internet for additional content related to the content currently being displayed in the Media Player window. LaBarge does **not** disclose or suggest any reproduction of audio/visual (AV) data and markup documents in an interactive mode in which AV data corresponding to the markup document is embedded in the markup document loaded on a screen for presentation, and any interaction between the markup document and the user which advantageously enables the user control the

presentation on the markup resources representing AV data in the manner defined in Applicants' base claim 8.

As a secondary reference, Morrison simply provides a text book on how to program web pages in XSL and HTML languages. Similar to the noted deficiencies of LaBarge, there is **no** disclosure of how "the markup document" and the "markup resources representing AV data linked to the markup document" are obtained and how an AV screen is embedded in a markup screen, as shown in FIG. 5 of Applicants' disclosure.

More importantly, there is **no** disclosure from either LaBarge or Morrison of specific implementation procedure on how a markup document is prepared and presented in an interactive mode, particularly, in the context in which both "the markup document" and the "markup resources representing AV data linked to the markup document", including:

interpreting the markup document and generating a document object tree according to a predetermined rule;

interpreting a stylesheet to define a document form of the markup document and generating a style rule/selector list;

interpreting a script code that is included in the markup document;

applying the style rule/selector list to the document tree to create a document form;

generating a formatting structure that corresponds to the document form;

rendering the markup document according to the format structure; decoding markup resources representing AV data linked to the markup document and outputting the markup document rendered along with the markup resources representing AV data,

wherein the markup document is presented on a screen and the markup resources representing AV data are presented in the display window defined by the markup document on the screen can be interactive with a user, and

wherein the presentation of the markup resources representing AV data is interactive and can be controlled by a user.

In view of these reasons and the noted deficiencies of the proposed combination, Applicants respectfully request that the rejection of claims 8-10 and 14 under 35 U.S.C. §103(a) as being unpatentable over LaBarge and Michael Morrison be withdrawn.

In view of the foregoing amendments, arguments and remarks, all claims are deemed to be allowable and this application is believed to be in condition to be passed to issue. Should

any questions remain unresolved, the Examiner is requested to telephone Applicants' attorney at the Washington DC office at (202) 216-9505. Applicants respectfully reserve all rights to file subsequent related application(s) (including reissue applications) directed to any or all previously claimed limitations/features which have been amended or canceled, or to any or all limitations/features not yet claimed, i.e., Applicants have no intention or desire to dedicate or surrender any limitations/features of the disclosed invention to the public.

INTERVIEW:

In the interest of expediting prosecution of the present application, Applicants respectfully request that an Examiner interview be scheduled and conducted. In accordance with such interview request, Applicants respectfully request that the Examiner, after review of the present Amendment, contact the undersigned local Washington, D.C. attorney at the local Washington, D.C. telephone number (202) 216-9505 ext. 232 for scheduling an Examiner interview, or alternatively, refrain from issuing a further action in the above-identified application as the undersigned attorneys will be telephoning the Examiner shortly after the filing date of this Amendment in order to schedule an Examiner interview. Applicants thank the Examiner in advance for such considerations. In the event that this Amendment, in and of itself, is sufficient to place the application in condition for allowance, no Examiner interview may be necessary.

To the extent necessary, Applicants petition for an extension of time under 37 CFR §1.136. If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 503333.

Respectfully submitted,

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